WR Grace

SR00000577

Bankruptcy Form 10

Index Sheet

Claim Number: 00009571

Receive Date: 03/28/2003

Multiple Claim Reference

Claim Number _____

- ☐ MMPOC Medical Monitoring Claim Form
- ☐ PDPOC Property Damage
- ☐ NAPO Non-Asbestos Claim Form
- ☐ Amended

Claim Number _____

- ☐ MMPOC Medical Monitoring Claim Form
- ☐ PDPOC Property Damage
- ☐ NAPO Non-Asbestos Claim Form
- ☐ Amended

Attorney Information

Firm Number: 00334

Firm Name: Duane Morris LLP

Attorney Number: 00210

Attorney Name: Michael R Lastowski

Zip Code: 19801

Cover Letter Location Number: SR00000577

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
☐ TBD	☐ TBD	☒ Other Attachments
☐ TBD	☐ TBD	
☐ TBD	☐ TBD	
☐ TBD	☐ TBD	
☐ TBD	☐ TBD	
	☐ Other Attachments	

Other

- ☐ Non-Standard Form
- ☐ Amended
- ☐ Post-Deadline Postmark Date

FORM B10 (Official Form 10) (4/01)

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE	PROOF OF CLAIM
Name of Debtor W.R. Grace & Co., Inc. Case Number 01-01139 (JKF)	
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A "request" for payment of an administrative expense may be field pursuant to 11 U.S.C. § 503.	
Name of Creditor (The person or other entity to whom the debtor owes money or property): Uniroyal, Inc. Name and addresses where notices should be sent: Michael R. Lastowski, Esquire Ralph N. Sianni, Esquire Duane Morris LLP 1100 North Market Street, Suite 1200 Wilmington, DE 19801 Telephone number: 302-657-4900	☐ Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. ☒ Check box if you have never received any notices from the bankruptcy court in this case. ☒ Check box if the address differs from the address on the envelope sent to you by the court. THIS SPACE IS FOR COURT USE ONLY
Account or other number by which creditor identifies debtor:	Check here if this claim ☐ replaces a previously filed claim, dated: _____ ☐ amends

1. Basis for Claim

☐ Goods sold
☐ Services performed
☐ Money loaned
☐ Personal injury/wrongful death
☐ Taxes
☒ Other: See Attached

☐ Retiree benefits as defined in 11 U.S.C. § 1114(a)
☐ Wages, salaries, and compensation (fill out below)
Your SS #: _____ _____ _____
Unpaid compensation for services performed
om _____ (date) to _____ (date)

2. Date debt was incurred: See Attached.

3. If court judgment, date obtained: See Attached.

4. Total Amount of Claim at Time Case Filed: **Unliquidated, see attached.**

If all or part of your claim is secured or entitled to priority, also complete Item 5 or 6 below.
☐ Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.

5. Secured Claim.
☐ Check this box if your claim is secured by collateral (including a right of setoff).
Brief Description of Collateral:
☐ Real Estate ☐ Motor Vehicle
☐ Other _____

Value of Collateral: $ _____

Amount of arrearage and other charges at time case filed included in Secured claim, if any: $ _____

6. Unsecured Priority Claim.
☐ Check this box if you have an unsecured priority claim
Amount entitled to priority $ _____
Specify the priority of the claim:
☐ Wages, salaries, or commissions (up to $4,650), * earned within 90 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. § 507(a)(3).
☐ Contributions to an employee benefit plan – 11 U.S.C. §507(a)(4).
☐ Up to $2,100* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. § 507(a)(6).
☐ Alimony, maintenance, or support owed to a spouse, former spouse, or child – 11 U.S.C. § 507(a)(7).
☐ Taxes or penalties owed to governmental units – 11 U.S.C. § 507(a)(8).
☐ Other – Specify applicable paragraph of 11 U.S.C. § 507(a)(____).
**Amounts are subject to adjustment of 4/1/04 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.*

7. Credits: The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim.

8. Supporting Documents: *Attach copies of supporting documents,* such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary. **See Attached Settlement Agreement**

9. Date-Stamped Copy: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.

THIS SPACE IS FOR COURT USE ONLY

Date	Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any):
March 27, 2003	Ralph N. Sianni, Esquire

WR Grace BF.39.156.7790
00009571
SR=577

Penalty for presenting fraudulent claim: Fine of up to $500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

WLM\171636.1

REC'D MAR 2 8 2003

SUPPLEMENT TO PROOF OF CLAIM

OF UNIROYAL, INC.

Uniroyal, Inc. (the "Claimant") was and is a defendant in numerous actions to recover Asbestos Personal Injury Claims and Asbestos Property Damage Claims, and will be a defendant in many such actions which are yet to be filed. The Debtor is, was, could or should be or have been a co-defendant in such actions and jointly and severally liable with the Claimant for any damages therein.

The Claimant has paid and will continue to pay substantial sums in satisfaction of judgments entered in prior, pending and future legal actions (and other formal or informal claims resolution procedure) which have been or hereafter may be instituted against the Claimant with respect to (i) Asbestos Personal Injury Claims and (ii) Asbestos Property Damages Claims. The sums which the Claimant has expended to date in satisfaction of judgments entered in such actions are set forth in part in Exhibit A attached hereto. (The documents upon which the Claim is founded are voluminous and therefore have not been attached.) In addition, the Claimant has expended and will continue to expend substantial sums in legal fees, litigation expenses, costs of defense and related fees, expenses and costs in connection with the foregoing.

As a result of the foregoing, the Claimant has a Claim against the Debtor to recover the aforementioned sums. A portion of this Claim is entitled to administrative priority under the Bankruptcy Code. To the extent any portion of the Claim is not entitled to administrative priority, it is a general unsecured claim.

The consideration for this indebtedness is Claimant's right to contribution, indemnity, reimbursement and subrogation from the Debtor pursuant to state and federal law, including, without limitation, laws relating to strict liability, negligence, breach of warranty, breach of contract and restitution.

The Claimant reserves the right to supplement and amend this Proof of Claim from time to time during the course of the proceedings.

By filing this Proof of Claim, Claimaint does not waive any right, claim or privilege, including, without limitation: (a) any right of subrogation under Section 509 of the Bankruptcy Code; (b) any right to elect or request subrogation under Section 502(e) of the Bankruptcy Code; (c) its position that portions of the Claim are non-dischargeable and non-enjoinable; (d) its right to challenge the jurisdiction of the Bankruptcy Court or District Court with respect to any litigation relating to its claims; (e) its right to have final orders in noncore matters entered only after de novo review by a District Judge; (f) its right to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding relating to this case; (g) its right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (h) its right to assert any claims against the Debtor's affiliates or insurers; (i) its position that certain portions of the Claim are not "claims," as that term is defined in the Bankruptcy Code; (j) its right to assert claims against the Debtor and its Affiliates, successors, assigns, managers, owners, officers, directors, employees, and insurers for any Dervivative

Asbestos Claim that relates to any Demand (as that term is defined in Section 524 of the Bankruptcy Code) or that otherwise arises or accrues after the Petition Date; and (k) any other rights, claims, actions defenses, setoffs, recoupments, or privileges which the Claimant may now have or become entitled to in the future under any agreements, at law, in equity or otherwise, all of which rights, claims, actions defenses, setoffs, recoupments, or privileges the Claimant expressly reserves.

Correspondence concerning this Proof of Claim should be sent to:

Michael R. Lastowski, Esquire
Ralph N. Sianni, Esquire
Duane Morris LLP
1100 North Market Street, Suite 1200
Wilmington, DE 19801-1246
Telephone: (302) 657-4900
Facsimile: (302) 657-4901
E-mail: mlastowski@duanemorris.com
rnsianni@duanemorris.com

Robert V. D'Angelo, Jr., Esquire
Uniroyal Holding Corporation
70 Great Hill Road
Naugatuck, CT 06770

EXHIBIT A to Supplement to Proof of Claim

Last Name	First Name	SSN	State	Total Comp	Share	Verdict Date
Alford	Daniel	249-46-7282	PA	$25,000.00	$2,726.73	9/1/1993
Banks	Joseph	186-01-3117	PA	$25,000.00	$2,726.73	5/1/1993
Bryson	Otis	257-12-7881	PA	$87,200.00	$9,489.03	11/1/1993
Collins	Robert	094-28-2619	NY	$5,418,668.00	$500,000.00	4/1/1994
Collins Sr.	Paul	161-01-6003	PA	$50,000.00	$5,453.46	9/1/1993
Copechal	Edward	227-12-0109	PA	$125,000.00	$13,633.67	3/1/1994
Dewitt	Howard	182-16-5084	PA	$100,000.00	$10,906.94	5/1/1994
Fields	James	247-24-0639	PA	$150,500.00	$16,414.94	11/1/1993
Howard Jr.	Thomas	190-34-8399	PA	$20,000.00	$2,181.39	9/1/1993
Howard Sr.	Thomas	198-01-2790	PA	$50,000.00	$5,453.46	9/1/1993
Jackson	James	165-12-3928	PA	$100,000.00	$10,906.94	11/1/1993
Jones	Vaughn	255-05-9570	PA	$100,000.00	$10,906.94	11/1/1993
Kahmer	Ralph	198-07-1756	PA	$420,000.00	$33,811.50	10/1/1993
Kennedy	Harold	205-28-6880	PA	$100,000.00	$10,906.94	11/1/1993
Knox	Olin	245-28-1116	PA	$100,000.00	$10,906.94	11/1/1993
Manning	Keran	068-26-0545	NY	$5,000,000.00	$500,000.00	4/1/1994
Nicholson	Lucy	207-20-1362	PA	$100,000.00	$10,906.94	11/1/1993
Peoples	Calvin	204-24-6212	PA	$20,000.00	$2,181.38	9/1/1993
Pyzanowski	Joseph	173-03-6380	PA	$310,000.00	$45,809.13	10/1/1993
Richardson Jr.	Percy	205-36-1903	PA	$30,000.00	$3,272.08	9/1/1993
RichardsonSr.	Percy	436-26-6702	PA	$25,000.00	$2,726.73	5/1/1993
Rivers	Jack	249-10-6748	PA	$100,000.00	$10,906.94	3/1/1994
Rizzuto	Gasper	439-26-3123	PA	$50,000.00	$5,453.46	10/1/1993
Saddington	Raymond	163-07-0600	PA	$800,000.00	$87,225.48	9/1/1993
Samuel	Dydell	211-20-6649	PA	$380,000.00	$41,446.35	10/1/1993
Smith	Clarence	255-44-5151	PA	$125,000.00	$13,633.67	9/1/1993
Smith	George	186-24-0808	PA	$100,000.00	$10,906.94	11/1/1993
Swain	Daniel	142-28-9932	PA	$100,000.00	$10,906.94	3/1/1994
Thomas	John	192-22-1500	PA	$250,000.00	$27,267.34	9/1/1993
Thompson	Donza	237-52-9705	PA	$25,000.00	$2,726.73	9/1/1993
Tillman	Frank	240-40-2094	PA	$250,000.00	$27,267.34	9/1/1993
Williams	Irwin	166-28-3396	PA	$100,000.00	$10,906.94	3/1/1994
Brady	Eugene	434-78-1323	LA	$814,000.00	$149,466.00	11/2/1995
Coincoin	Eugene	439-62-9094	LA	$200,000.00	$25,000.00	12/30/1997
Shaddox	Henry	428-12-5275	MS	$17,875,000.00	$17,875,000.00	8/5/1993
Young	John	191-24-6144	PA	$250,000.00	$46,475.05	5/18/2001
Cannon	Charles	201-30-5463	PA	$200,000.00	$138,524.95	5/18/2001
		TOTAL		$33,975,368.00	$19,694,436.00	